From: Grant Davids [mailto:grant@de-water.com]
Sent: Tuesday, January 10, 2012 8:56 AM

To: Alemi, Manucher

Cc: Jemaa, Fethi Ben; Frame, Kent; Berbach, Martin; Bryan Thoreson; Byron Clark

**Subject:** Appendix B Davids Engineering Comments

## Hi Manucher,

Attached are comments by Bryan Thoreson, Byron Clark and me on Appendix B of the current draft methodology report for DWR's consideration. Given the importance of Appendix B as the technical foundation for implementing the various efficiency methodologies, our collective opinion is that it should be distributed and reviewed more widely among researchers and practitioners, beyond the members of the A1 subcommittee.

Also, there is one conceptual gap, which is the simultaneous use of water for multiple beneficial purposes, such as water applied to decompose rice stubble, provide winter habitat for birds and recharge groundwater aquifers. When we think of water use efficiency in the broadest terms, it seems like simultaneous beneficial uses should at least be acknowledged and, better, somehow addressed in quantitative analyses.

Thank you for the opportunity and additional time to review and compose our comments. We would be happy to engage in further discussion to explain and expand upon them, if that would be helpful.

## Grant

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